

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE GREENEVILLE DIVISION

B.P., H.A., and S.H., individually, and on )  
Behalf of all others similarly situated, )  
 )  
Plaintiffs, )  
 )  
VERSUS )  
 )  
CITY OF JOHNSON CITY, TENNESSEE, *et al* )  
 )  
Defendants. )

No. 2:23-cv-00071-TRM-CRW

**MOTION TO SEAL EXCERPTS OF DEPOSITION OF B.P.**

COME NOW the Defendants, Kevin Peters and Toma Sparks, in their individual capacities, by and through counsel, and pursuant to LR 37.2 and 26.2(b), and ECF Rule 12.2, and move the Court to permit filing under seal of certain excerpts of the Deposition of B.P., a named Plaintiff in this cause. In support of this Motion to Seal, the excerpts attached relate directly to the circumstances of B.P.'s alleged sexual assault, and the details she reported thereafter. This material is potentially significant in connection with the potential prosecution of Sean Williams for alleged crimes perpetrated by him against B.P., and it is appropriate that this material be sealed from public view. The movant would state and show unto the Court that there is good cause to file these materials under seal in accordance with the Court's Rules. Undersigned counsel has consulted with counsel for Plaintiff B.P., offered to file the material under seal or publicly, and counsel for B.P. confirmed that B.P. requested that the material be remained sealed. Undersigned would further state and show unto the Court that the material cannot be redacted in a fashion that it can be filed on the public docket in a manner that would permit the Court to understand it and appropriately preserve the confidentiality of the material, and the material

cannot be redacted in a fashion where it can be publicly filed. All material that *can* be filed publicly in connection with these Defendants' Response has been appropriately filed publicly.

WHEREFORE, in consideration of the foregoing, these Defendants move the Court to permit these excerpts from the deposition of B.P. to be filed under seal in support of Defendants' Response.

Respectfully submitted,

MOORE, RADER AND YORK, P. C.

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## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was filed electronically with the Court. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's electronic filing system.

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This the 17th day of July, 2024.

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